

# EXHIBIT

A

**Robert P. Donovan**

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**From:** Carlos Ramirez <cramirez@reesellp.com>  
**Sent:** Friday, May 29, 2020 1:34 PM  
**To:** Robert P. Donovan  
**Cc:** Kathleen N. Fennelly; Melissa Weiner (Mweiner@pswlaw.com); Bourne, Joseph C.; Michael Reese  
**Subject:** Re: Ashour v. AriZona: Meet & Confer

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Bob,

Perhaps I should clarify the reason for our request. I think that we can all agree that this is a fairly straightforward labeling case. In addition, our client was not in a business relationship with your clients and is merely the retail consumer of just two of your clients' products.

Despite this, your clients have propounded 136 requests on a single consumer plaintiff. Most of these requests are unreasonably cumulative/duplicative, wholly unrelated to Plaintiff's allegations, unduly burdensome and, as a whole, rise to the level of being oppressive/harassing. Accordingly, it would be unfair for our client to have to answer requests that have not been propounded in good faith.

Please let us know when we can meet and confer.

Best regards,

Carlos

Carlos F. Ramirez  
Partner  
**Reese LLP**  
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Hawthorne, NY 10532  
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On Fri, May 29, 2020 at 11:26 AM Robert P. Donovan <[rdonovan@mdmc-law.com](mailto:rdonovan@mdmc-law.com)> wrote:

Carlos-

Before any meaningful meet and confer, defendants would need to receive plaintiff's objections to the specific requests of concern.

Please advise if that can done and, if so, by what date.

We can then schedule a conference call.

Thank you-

Bob

**Robert P. Donovan**

Partner

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**From:** Carlos Ramirez [<mailto:cramirez@reesellp.com>]

**Sent:** Thursday, May 28, 2020 11:54 AM

**To:** Robert P. Donovan

**Cc:** Kathleen N. Fennelly; Melissa Weiner ([Mweiner@psqlaw.com](mailto:Mweiner@psqlaw.com)); Bourne, Joseph C.; Michael Reese

**Subject:** Ashour v. Arizona: Meet & Confer

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Bob,

We would like to have a meet and confer regarding Defendants' Initial Request For Production of Documents to Plaintiff. While we typically would not meet and confer prior to providing responses, we think that this would be the most efficient way to proceed in light of the volume and breadth of the requests.

We can be available next week on Wednesday 6/10 after 3:00 p.m. ET or anytime on Thursday 6/11.

Best regards,

Carlos

Carlos F. Ramirez

Partner

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